DOCKET FILE COPY ORIGINAL

ORIGINAL

RECEIVED

MAR 1 2 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Federal-State Joint Board on Universal Service	)	**CC Docket No. 96-45**
	)	
	)	

WORLDCOM REPLY COMMENTS

WORLDCOM, INC.

Alan Buzacott
1133 19th Street, N.W.
Washington, DC 20036
(202) 887-3204

March 12, 2001

No. of Copies rec'd 0+4
List ABCDE

TABLE OF CONTENTS

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Federal-State Joint Board on Universal Service	)	**CC Docket No. 96-45**
	)	
	)	

WORLDCOM REPLY COMMENTS

WorldCom, Inc. (WorldCom) hereby submits its reply to comments on the Federal-State Joint Board's Recommended Decision.[1]

I. Introduction and Summary

While there is strong support in the record for the Rural Task Force (RTF) recommendation that implicit universal service support currently provided by rural carriers' interstate access charges be transferred to a High Cost Fund III (HCF III), the record provides no evidentiary basis for the Commission to adopt RTF's recommendation to "rebase" the High Cost Loop (HCL) fund or RTF's recommendation to establish a "safety valve" mechanism. There is, in particular, no evidence in the record that the larger HCL fund recommended by the RTF is even consistent with the requirements of Section 254 of the Act.

[1]Federal-State Joint Board on Universal Service, Recommended Decision, CC Docket No. 96-45, released December 22, 2000 (Recommended Decision).

At this time, the Commission should focus on the creation of the HCF III fund and on the related access reform measures for rate of return carriers – steps for which there is strong support in the record. Certainly, the HCL-related changes recommended by the RTF should not be given higher priority than the creation of HCF III and access reform for rate of return carriers.

II. The Commission Should Focus on the HCF III and on Access Reform

Commenters agree that the Commission should remove implicit universal service support from rural carriers' access charges and transfer this support to the HCF III. First, commenters note that the Commission has a statutory obligation to identify any universal service support that is implicit in interstate access charges and, as far as possible, make that support explicit.[2] Five years after the passage of the Telecommunications Act of 1996, the creation of an explicit universal service support mechanism to replace implicit support in rural ILECs' interstate access charges is long overdue.

Second, no commenter disputes the RTF's conclusion that there is implicit universal service support in rural rate of return carriers' interstate access charges. While WorldCom does not agree with the RTF's assumption that the entire differential between rural rate of return carriers' revenue requirement and "appropriate unit prices of interstate access" constitutes implicit universal service support, it is clear that there is substantial implicit support in rural carriers' interstate access charges.

---

[2] See, e.g., AT&T Comments at 5-6.

Third, commenters agree that the elimination of implicit support advances the "pro-competitive" objectives of the Act. Not only would the support provided by the HCF III mechanism be portable, but the transfer of implicit support from per-minute access charges to an explicit mechanism makes it less likely that competitive entry would erode universal service support.[3] Rural ILECs have consistently expressed concern that the loss of access revenues from a limited number of high-volume business customers could have significant consequences for universal service.

Fourth, the removal of implicit support from rural carriers' access charges would be consistent with the rate averaging provisions of Section 254(g). In the wake of the CALLS Order,[4] the growing disparity between price cap and rate of return carrier access charges places unnecessary burdens on IXCs that operate on a nationwide basis.

Finally, the RTF Recommendation[5] provides a framework for the Commission to move forward with access reform for rate of return ILECs. WorldCom agrees with AT&T that access reform for rate of return ILECs should include adjusting rate of return carriers' SLC caps to the levels established in the CALLS Order and should also include a

---

[3] See, e.g., Access Charge Reform, First Report and Order, CC Docket No. 96-262, released May 16, 1997, at ¶¶ 32-33 (Access Reform Order).

[4] Access Charge Reform, Sixth Report and Order, CC Docket No. 96-262, released May 31, 2000 (CALLS Order).

[5] Federal-State Joint Board on Universal Service, Rural Task Force Recommendation to the Federal-State Joint Board on Universal Service, released September 29, 2000 (RTF Recommendation).

requirement that rate of return ILECs recover their USF contributions through an end user charge.[6]

III. There is No Basis for "Rebasing" the HCL Fund

As discussed in WorldCom's initial comments, neither the RTF Recommendation nor the Joint Board's Recommended Decision provide any justification for the RTF's recommendation that the Commission eliminate the indexed cap and "rebase" the HCL fund to the full amount computed by the expense adjustment formula. While the rural ILEC commenters enthusiastically support this recommendation, they also fail to provide any evidentiary basis for the Commission to increase the size of the HCL fund.

The fact that the RTF Recommendation represents "a consensus of competing views"[7] does not, by itself, justify adoption of the larger fund recommended by the RTF. Section 254 requires that the Commission establish that the fund size recommended by the RTF is tailored to providing support for only those services that are included in the Section 254(c)(1) definition of universal service, and only in an amount that is "sufficient" to achieve the purposes of Section 254.[8] And the Commission must provide a reasoned basis for reconsidering its conclusion in the Universal Service Order that the indexed cap provides sufficient support.[9]

---

[6]AT&T Comments at 8-9.

[7]Recommended Decision at ¶ 10.

[8]47 U.S.C. §§ 254(b)(5), 254(c)(1), 254(e).

[9]Federal-State Joint Board on Universal Service, Report and Order, CC Docket No. 96-45, released May 8, 1997 (Universal Service Order)at ¶¶ 282, 302 ("From our

Reflecting these requirements, the Commission has previously determined that it would be hesitant to provide more support than is available under the indexed cap without "clear evidence" that "such increases are necessary either to preserve universal service, or to protect affordable and reasonably comparable rates."[10] Neither the Recommended Decision nor the rural carrier comments provide the requisite "clear evidence." In fact, neither the Recommended Decision nor the rural ILEC comments even mention affordability or rate comparability concerns, much less demonstrate that support under the indexed cap is not sufficient to protect affordable and reasonably comparable rates.

The sole justification that the Joint Board and the rural carrier commenters offer for increasing the size of the HCL fund is that the larger fund would "provide increased incentives to invest in new infrastructure and technologies."[11] But even if it were true that a larger fund would provide such incentives -- and it is doubtful that this is the case[12] -- "incentive to invest in new infrastructure" is not, in and of itself, one of the purposes of Section 254 that the Commission may consider in determining whether the universal

---

experience with the indexed cap on the current high cost support mechanisms, implemented pursuant to the recommendations of the Joint Board in the 80-286 proceeding, we find that the indexed cap effectively limits the overall growth of the fund, while protecting individual carriers from experiencing extreme reductions in support.")

[10]Federal-State Joint Board on Universal Service, Seventh Report and Order and Thirteenth Order on Reconsideration, 14 FCC Rcd 8078, 8111-8112 (1999).

[11]See New York Department of Public Service Comments at 6 ("We have found no other purported justification in the Joint Board's Recommended Decision for increasing the current levels of rural study area high cost funding.")

[12]See NYDPS Comments at 7-8. As NYDPS points out, because the size of the "rebased" fund is based on embedded cost, it would reflect past behavior. Moreover, "[T]here simply is no necessary nexus between the purported desired outcome (investment in new infrastructure) and the supposed incentive (high cost funding)."

service fund is sufficient.[13] Indeed, allowing such a vague and open-ended objective as "incentives to invest in new infrastructure" to justify an increase in the size of the universal service fund would inherently be at odds with the congressional mandate to limit subsidies to well-defined services and specific purposes.

Moreover, if the universal service fund were inflated in order to subsidize a vague objective such as providing incentives for infrastructure investment, the universal service program would not be accountable to the consumers that are required to contribute to the fund. As the New York Department of Public Service points out, neither the RTF nor the Joint Board has specified what particular investments this funding should be "incenting."[14] And even if the objectives of the program were clearer, rural carriers are not subject to any reporting requirements that would allow the Commission to determine if the objectives were being met.[15]

There is no merit to the rural carriers' suggestion that Section 254(b)(2) compels support increases to fund "infrastructure investments necessary for providing access to advanced services."[16] While Section 254(b)(2) is a principle that the Commission must consider in formulating its universal service policy, the universal service fund cannot subsidize infrastructure investments that are "necessary" for providing access to advanced services unless advanced services are first included in the Commission's definition of

---

[13]47 U.S.C. § 254 (e) (support should be "sufficient to achieve the purposes of this section")

[14]NYDPS Comments at 8.

[15]See Ad Hoc Comments at 6-7, WorldCom Comments at 3-4.

[16]See RTF Recommendation at 22.

universal service pursuant to Section 254(c)(1). WorldCom agrees with Sprint that the provision of support for advanced services "prior to their approval under Section 254(c) would constitute a short-cut around the section 254 process."[17]

In a superficially different version of the RTF's argument, the RTF contends that the fund increase is intended to "eliminate barriers to advanced services."[18] While it is true that the Commission has determined that the loop design incorporated into its cost model should not "impede the provision of advanced services," this instruction was issued in the context of the Commission's decision that the technology assumed in the forward-looking cost study must be the "least-cost, most-efficient, and reasonable technology for providing the supported services that is currently being deployed."[19] In light of the RTF's rejection of the Commission's cost model, the Commission's instruction concerning advanced services capability has no obvious relevance to rural carrier universal service support. Certainly, the context in which the instruction was issued shows that it cannot be interpreted the way the RTF has interpreted it, as authorizing larger subsidies whose purpose is to accelerate the updating of rural carrier networks for the provision of advanced services.

To the extent that the RTF is suggesting that support under the indexed cap is not sufficient to support rural carrier infrastructure that meets the technology standards implicit in the non-rural carrier cost model, there is no evidence to support such a claim.

---

[17]Sprint Comments at 3.

[18]RTF Recommendation at 22.

[19]Universal Service Order, ¶ 250, Criterion 1.

From all indications, the rural carriers are deploying modern network technologies.[20] In particular, the Commission recently found that fully two-thirds of rural telephone companies and cooperatives are already offering advanced services or plan to offer them in the future.[21]

Under no circumstances should the Commission adopt the proposal of NTCA and other proponents of the MAG plan that the HCL mechanism be entirely uncapped, i.e., not only "rebased" but allowed to grow without limit. As the Commission has determined, a cap on the HCL fund "will encourage carriers to operate more efficiently by limiting the amount of support they receive" and will restrain "excessive growth."[22] While the inflation- and line growth-adjusted cap recommended by the RTF is unduly generous,[23] it is better than no cap at all.

---

[20]See, e.g., NTCA 21st Century White Paper Series, "Community Based Telephone Service for Rural America," May, 2000, at 6 ("At the end of 1997, over 99 percent of rural telco switches were digital. In contrast, the Regional Bell Operating Companies (RBOCs) still had almost 15 percent of their switching investment in analog switches.") At page 10 of the same white paper, NTCA states that "rural carriers have been able to bring rural customers basic options that their urban counterparts receive."

[21]Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, Second Report, CC Docket No. 98-146, released August 21, 2000, at ¶ 221.

[22]Universal Service Order at ¶ 302.

[23]There is no evidence in the record that the per-line cost of supported services can be expected to increase at the rate of inflation during the five-year term of the RTF Recommendation.

IV. The Commission Should Not Adopt the Safety Valve Mechanism

In their comments, the rural ILECs endorse the RTF's recommendation that rural carriers be eligible for "safety valve" support when they make a "meaningful investment" in exchanges acquired from other carriers. The "safety valve" scheme would allow the rural ILECs to partially evade the requirements of Section 54.305 of the Commission's rules, which limits universal service support to the amount available for the exchange prior to its acquisition.

As an initial matter, there is no merit to the suggestion of CenturyTel and several other rural ILECs that Section 54.305 "denies rural telephone companies universal service support that is sufficient to achieve the affordable and reasonably comparable rates and services mandated by the 1996 Act."[24] Given that all acquisitions of exchanges are voluntary, the Commission can reasonably assume that no rural carrier would acquire an exchange if the projected revenues, including universal service support available pursuant to Section 54.305, did not enable the rural carrier to earn a return on its investment while providing those services included in the Section 254(c)(1) definition of universal service.

The record confirms that customers served by acquired exchanges have not been "doomed" to second-rate service. Even as CenturyTel complains that support under Section 54.305 is not sufficient, it admits that it is able to "invest heavily to modernize the exchange facilities" of acquired exchanges and "offer . . . customers [served by these exchanges] such common services as fiber optic facilities, digital switching, voice mail,

---

[24]CenturyTel Comments at 5.

caller ID, local dialup Internet access, and DSL."[25] Similar statements have been made by every other rural ILEC that has acquired exchanges in the four years since the Commission adopted Section 54.305.[26]

Some rural ILECs suggest that Section 54.305 has harmed universal service by discouraging rural ILECs from acquiring and upgrading "neglected" RBOC exchanges.[27] But the Commission has never viewed the transfer of exchanges to rural ILECs as an instrument for advancing the Act's universal service goals. Indeed, it is the Commission's longstanding policy that its universal service rules should neither encourage nor discourage the transfer of exchanges to rural ILECs.[28]

To the extent that the ILECs are suggesting that Section 54.305 has artificially discouraged exchange transfers that would have been in the public interest, there is no evidence that exchange transfers have been discouraged in any way. Despite the constraints of Section 54.305 and other Commission policies, there continues to be a wholesale transfer of access lines from non-rural to rural carriers. Millions of access lines have been transferred from the RBOCs to rural ILECs over the past decade, with no sign that the pace of transfers has slowed since Section 54.305 was adopted in 1997.

---

[25]CenturyTel Comments at 3.

[26]See, e.g., Sully Buttes Telephone Cooperative Inc. and Qwest Corporation, Joint Petition for Waiver of the Definition of "Study Area" Contained in the Part 36 Appendix-Glossary of the Commission's Rules; Petition for Waiver of Sections 61.41(c), 61.41(d), and 69.3(e)(11) of the Commission's Rules, Order, CC Docket No. 96-45, released August 18, 2000, at ¶ 11.

[27]NRTA, OPASTCO and USTA Joint Comments at 4.

[28]Universal Service Order at ¶ 308.

Moreover, the Commission has recently revised its universal service rules for non-rural carriers in a manner that may increase the universal service support available to rural carriers that acquire high-cost exchanges from the RBOCs or other non-rural carriers. Whereas non-rural carriers' per-line support had previously been the same throughout the carrier's study area, the Ninth Report and Order revised the support mechanism for non-rural carriers to target support to the highest-cost exchanges – precisely those exchanges that rural ILECs are likely to acquire.[29]

If the Commission does adopt a safety valve mechanism -- which it should not -- support should be limited by caps such as those outlined in Appendix D of the RTF Recommendation. There is no merit to NTCA's argument that caps such as those outlined in Appendix D are inconsistent with the requirement that support be "sufficient." In light of the Commission's concern that universal service support could unduly influence a carrier's decision to acquire exchanges, and the lack of any evidence in the record to support a specific level of safety valve support, it is reasonable for the Commission to hold support at modest levels until the Commission can evaluate the operation of the safety valve. Indeed, to evaluate whether the safety valve mechanism is in fact advancing the goals of Section 254, the Commission should require any ILEC that obtains safety valve support to submit to the Commission a complete description of any upgrades it has made to the acquired exchanges.

---

[29]Federal-State Joint Board on Universal Service, Ninth Report and Order and Eighteenth Order on Reconsideration, CC Docket No. 96-45, released November 2, 1999, at ¶¶ 73-75.

Similarly, there is no merit to NTCA's argument that a cap on the amount of available safety valve support would be inconsistent with the requirement that support be "predictable." The Commission has determined that support levels need not be "certain" or "permanent" in order to be predictable, only that the support can be precisely determined based on a given set of variables.[30] The Appendix D safety valve mechanism meets this test.

The Commission should not adopt the proposal of CenturyTel and several other commenters that the safety valve mechanism apply on a retroactive basis.[31] Because any rural ILECs that purchased exchanges during the past four years would have done so without any expectation of universal service support other than that permitted by Section 54.305, this must be viewed as conclusive evidence that the support permitted by Section 54.305 is "sufficient." The provision of additional support through a retroactive "safety valve" mechanism would simply provide a windfall to these ILECs.

Finally, the Commission should reject the MAG proponents' proposal for complete elimination of Section 54.305 and all other constraints on the amount of universal service support available to rural ILECs that acquire exchanges. As long as rural carriers continue to receive universal service support from the more generous embedded-cost mechanism, the Commission's reasons for adopting Section 54.305 are still valid. Elimination of all constraints would result in carriers "placing an unreasonable reliance upon potential

---

[30]CALLS Order at ¶ 212.

[31]Century Comments at 6. See also Western Alliance Comments at 8.

universal service support in deciding whether to purchase exchanges,"[32] and would lead to uncontrolled increases in the size of the universal service fund.

V. HCL Changes Should be Adopted, if at all, in a Package with HCF III

In light of the fact that there is no evidence in the record to support the larger HCL fund or the creation of the "safety valve" mechanism, the Commission should not adopt these parts of the RTF Recommendation. It should instead focus on the HCF III-related changes and associated access reform measures, for which there is strong record support.

Under no circumstances should the Commission decouple the various components of the RTF Recommendation in a manner that would give the HCL-related changes higher priority than the HCF III-related changes. The primary rationale that the Joint Board has given for endorsing the RTF Recommendation is that the RTF package "represents a consensus of competing views."[33] While this rationale does not adequately justify adoption of HCL-related recommendations that are not supported by record evidence, it strongly suggests that the Commission should adopt the HCL-related changes only if it adopts the HCF III-related changes and other portions of the package at the same time. As AT&T points out, "[t]o the degree that certain aspects of the package are adopted on a piecemeal basis, it would dampen the incentives of parties to continue to support issues on which they had compromised for the sake of supporting the package as a whole."[34]

---

[32] Universal Service Order at ¶ 308.

[33] Recommended Decision at ¶ 10.

[34] AT&T Comments at 2.

Accordingly, the Commission should not adopt NECA's proposal to address the HCF III-related changes in the MAG proceeding if the effect of this decoupling would be to give higher priority to the HCL-related parts of the RTF package.

VI. Conclusion

The Commission should not "rebase" the HCL fund or create a "safety valve" mechanism at this time.

Respectfully submitted,
WORLDCOM, INC.

Alan Buzacott
1133 19th Street, NW
Washington, DC 20036
(202) 887-3204

March 12, 2001

STATEMENT OF VERIFICATION

I have read the foregoing, and to the best of my knowledge, information, and belief there is good ground to support it, and that it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on March 12, 2001.

Alan Buzacott
Senior Manager, Regulatory Affairs
1133 19th Street, N.W.
Washington, D.C. 20036
(202) 887-3204

CERTIFICATE OF SERVICE

I, Vivian I. Lee, do hereby certify that copies of the foregoing Reply Comments were sent via first class mail, postage paid to the following on this 12th of March, 2000.

International Transcription Services**
1231 20th Street, N.W.,
Washington, DC 20036

Peter Arth, Jr.
Lionel B. Wilson
Ellen S. Levine
Jonady Hom Som
505 Van Ness Avenue
San Francisco, CA 94102

Michael J. Shortley
Global Crossing
180 South Clinton Avenue
Rochester, NY 14646

Gregory J. Vogt
Joshua S. Turner
Marcus E. Maher
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006

Samuel S. Ebbeson
President & Chief Executive Officer
Innovative Telephone
P.O. Box 6100
St. Thomas, USVI 00801-6100

David W. Zesiger
Director, ITTA
1300 Connecticut Avenue, N.W., Suite 600
Washington, Dc 20036

Karen Brinkmann
Richard R. Cameron
Latham & Watkins
1001 Pennsylvania Avenue, N.W.
Suite 1300
Washington, DC 20004-2505

Mark D. Wilkerson
Brantley, Wilkerson & Bryan, P.C.
P.O. Box 830
Montgomery, AL 36101-0830

George N. Barclay
Michael J. Ettner
GSA
1800 F Street, NW, Room 4002
Washington, DC 20405

Chuck Strand
TANE
1 Chestnut Pasture
Concord, NH 03301

David Cosson
John Kuykendall
Kraskin, Lesse & Cosson LLP
2120 L Street NW, Suite 520
Washington, DC 20037

Kevin J. Kelly
TCA Inc.
1465 Kelly Johnson Blvd., Suite 200
Colorado Springs, CO 80920

Pat Wood, III
Judy Walsh
Brett A. Perlman
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, TX 78711-3326

Benjamin H. Dickens, Jr.
Mary J. Sisak
Blooston, Mordkofsky, Dickens, Duffy & Prendergast
2120 L Street NW, Suite 300
Washington, DC 20037

Gerard J. Duffy
Blooston, Mordkofsky, Dickens, Duffy & Prendergast
2120 L Street NW, Suite 300
Washington, DC 20037

Sharon J. Devine
James T. Hannon
Kathryn Marie Krause
Qwest
Suite 700
1020 19th Street, N.W.
Washington, DC 20036

Leon Kestenbaum
Jay Keithley
Richard Juhnke
Sprint
401 9th Street, NW, Suite 400
Washington, DC 20004

Jimmy Jackson
GCI
2550 Denali Street, Suite 1000
Anchorage, Alaska 99503

Michele C. Farquhar
David L. Sieradzki
Hogan & Hartson, LLP
555 Thirteenth St., N.W.
Washington, DC 20004

Charles C. Hunter
Catherine M. Hannan
Hunter Communications Law Group
1620 I Street, NW, Suite 701
Washington, DC 20006

Paul J. Feldman
Fletcher, Heald & Hildreth, PLC
1300 North 17th Street
11th Floor
Arlington, VA 22209

Corwin Clairmont
Ronan Telephone Consumer Advisory Committee
P.O. Box 61
Ronan, MT 59864

James Rowe
Alaska Telephone Association
201 E. 56th, Suite 114
Anchorage, AK 99518

Heather H. Grahame
Dorsey & Whitney, LLP
1031 W. 4th Avenue, Suite 600
Anchorage, AK 99501

G. Nanette Thompson, Chair
Regulatory Commission of Alaska
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501-1963

Richard M. Sbaratta
BellSouth Corporation
Suite 4300
675 West Peachtree Street, N.E.
Atlanta, GA 30375-0001

Cynthia B. Miller
Florida PSC
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Jeffry H. Smith
GVNW Consulting, Inc.
8050 SW Warm Springs Street, Suite 200
Tualatin, OR 97062

Jan F. Reimers
ICORE
325 S. Second St.
Emmaus, PA 18049

Kelly R. Dahl
1500 Woodmen Tower
Omaha, NE 68102

Thomas E. Lodge
Thompson Hine & Flory LLP
One Columbus
10 West Broad Street, Suite 700
Columbus, OH 43215-3435

Lawrence O. Malone
Brian Ossias
NYDPS
Three Empire State Plaza
Albany, NY 12223-1352

Michael J. Travieso
NASUCA
8300 Colesville Road, Suite 101
Silver Spring, MD 20910

Dana K. Joyce
Marc D. Poston
Missouri PSC
P.O. Box 360
Jefferson City, MO 65102

Tara B. Shostek
Irwin, Campbell & Tannenwald, PC
1730 Rhode Island Avenue, NW
Suite 700
Washington, DC 20036-3101

Bruce C. Reuber, President
Interstate Telcom Consulting, Inc.
130 Birch Avenue West (P.O. Box 668)
Hector, MN 53342-0668

Susan M. Gately
Elizabeth P. Tuff
ETI
One Washington Mall
Boston, MA 02108-2617

Colleen Boothby
Levine, Blaszak, Block & Boothby, LLP
2001 L Street, NW, Suite 900
Washington, DC 20036

William F. Maher, Jr.
Stephen L. Goodman
Halprin, Temple, Goodman & Maher
555 12th Street, N.W.
Suite 950 North
Washington, DC 20004

Jeffrey F. Beck
Jillisa Bronfman
Beck & Ackerman
Four Embarcadero Center, Suite 760
San Francisco, CA 94111

Mark C. Rosenblum
Judy Sello
Room 1135L2
295 North Maple Avenue
Basking Ridge, NJ 07920

Hand Delivered**

____
Vivian Lee